

Message

From: Fairchild, Susan [Fairchild.Susan@epa.gov]
Sent: 8/22/2016 3:32:55 PM
To: Lancey, Susan [lancey.susan@epa.gov]; Barnett, Keith [Barnett.Keith@epa.gov]
CC: McDonnell, Ida [McDonnell.Ida@epa.gov]; Brown, Rudy [Brown.Rudy@epa.gov]
Subject: RE: EPA and Glass Manufacturing Standards
Attachments: 114 OECA to Lundberg Studios.pdf

Hi Susan,

I am attaching the 114 that OECA sent out to a similar art studio, as it may be helpful.

I am not suggesting you necessarily include this, but use it as you think is most helpful to your particular situation.

I am not aware of any new Federal rules regulating glass furnaces beyond the NSPS (Part 60, subpart CC), the Area source NESHAP (Part 63, subpart SSSSSS), and the Arsenic NESHAP (Part 61, subpart N).

Susan Fairchild
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From: Lancey, Susan
Sent: Monday, August 22, 2016 11:04 AM
To: Fairchild, Susan <Fairchild.Susan@epa.gov>; Barnett, Keith <Barnett.Keith@epa.gov>
Cc: McDonnell, Ida <McDonnell.Ida@epa.gov>; Brown, Rudy <Brown.Rudy@epa.gov>
Subject: FW: EPA and Glass Manufacturing Standards

Hi Susan and Keith,

Can you please see the email below forwarded to us from U.S. Senator Sanders office and the specific questions they are asking Region I? Our Congressional liaison has forwarded this message to the EPA HQ Office of Congressional and Governmental Affairs and we are waiting to hear back.

In Region I, we have identified one glass container manufacturer (Ardagh Glass, Milford, MA), subject to the glass manufacturing NESHAP (63 subpart 6S) and Title V operating permit program, but we have not identified any art glass manufacturing facilities subject to Subpart 6S. Rhode Island has an artisan college and several glass artisans, but RI DEM does not know whether the college or artisans meet the thresholds for being regulated by the glass manufacturing NESHAP. RI DEM has considered sending a survey letter to the college and artisans but has not yet done so.

I am aware that the glass manufacturing NESHAP, issued in December 2007, may apply to art glass facilities if they operate continuous furnaces, melt the target metals (arsenic, cadmium, chromium, lead, manganese, and nickel) as raw materials, and manufacture 50 tons per year of glass containing the target metals as raw materials. Facilities with existing furnaces were required to be in compliance with the emission limits and requirements of the rule by December 28, 2009. I am not aware other new federal air regulations impacting the art glass industry. But, please let me know if you are aware of new regulations that could impact the industry.

Also, please let us know if you have any information you think we should be including when we respond to this inquiry. Thank you,

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617-918-1656

From: Rampone, Emily (Sanders) [mailto:Emily_Rampone@sanders.senate.gov]
Sent: Friday, August 19, 2016 3:35 PM
To: Brown, Rudy <Brown.Rudy@epa.gov>
Cc: Thomas, Katie (Sanders) <Katie_Thomas@sanders.senate.gov>; Pero, Haley (Sanders) <Haley_Pero@sanders.senate.gov>
Subject: RE: EPA and Glass Manufacturing Standards

Hi Rudy,

I'm just checking in to see if you had a chance to look into this regulation. Please let me know if I should direct this inquiry to someone else.

Thank you for all your help!

Emily

From: Rampone, Emily (Sanders)
Sent: Tuesday, August 02, 2016 4:18 PM
To: 'Brown, Rudy' <Brown.Rudy@epa.gov>
Cc: Thomas, Katie (Sanders) <Katie_Thomas@sanders.senate.gov>; Pero, Haley (Sanders) <Haley_Pero@sanders.senate.gov>
Subject: EPA and Glass Manufacturing Standards

Hi Rudy,

Below I have pasted the narrative of a letter from a constituent who is concerned about EPA regulations for glass manufacturers. Are there any glass manufacturers in Region 1 that need to apply for a Title V permit? Are there any new regulations relating to glass manufacturing that we should be aware of?

Thank you for all your help,

Emily Rampone
Legislative Correspondent
Office of Senator Bernard Sanders
332 Dirksen Senate Office Building
(202) 224-5141

Enclosure:

This week Spectrum Glass in Washington announced that after 40 years of producing colored art glass they will be closing their doors in July. They are the main American manufacturer of many types of colored art glass. This affects an estimated 30,000 Stained Glass, Fused Glass and Glass Blowing Artists, Stores, Art Studios and Hobbyists across America. Fortunately, arrangements have been made for Uroboros Glass in Oregon state to take over production of some of their Art Glass Product line. But there is still a huge problem threatening the American Art Glass Community.

The entire U.S. art glass industry is now being evaluated by the Environmental Protection Agency (EPA) with respect to potential new regulations. Spectrum is the first to announce it's closure, but other glass producing companies are also evaluating their options. Uroboros Glass has suspended production of two-thirds of their glass while EPA re-evaluates their standards. Long-standing interpretations of air quality regulations are being reevaluated, and if new regulations are applied to our industry, it would require substantial capital expenses. Spectrum Glass Company has operated well within existing environmental guidelines and has been the only stained glass manufacturer to employ baghouse technology on furnace exhaust. Still, they have already accrued extraordinary, unanticipated expenses since the start of the EPA evaluation and cannot withstand additional investments of an unknown scale. These business collapses will have a ripple effect across the country.

What you need to know:

The stained and colored glass industry is a small, but home grown American manufacturing phenomenon. It's unique in the world, provides steady manufacturing jobs for American workers, and is an exporting industry as well.

This industry of just six manufacturers is facing \$2.5-3.5 million of capital investment due to regulatory changes with no advance warning. This investment may prove too much for several of them to bear. Government intervention is needed for them to meet the goals of the new regulations in such a short time frame.

The industry is willing to meet new regulations, but it needs reasonable time to do so.

The manufacturers are all owned by single individuals and their families, who work daily at their plants. They don't have the resources of publicly traded corporations to simply pay up and move on.

These manufacturers supply thousands of other businesses and craftsmen who depend on their unique glass styles to complete their work. They are now at risk of being put out of work themselves.

The very suppliers who have created the iconic glass of the American stained glass legacy are at risk due to this situation.

There is currently no actual verification that the glass industry is connected to the detected toxins. EPA did moss testing, a new science, which raised public concern. They retested and found the levels to be safe. The current EPA review and imposed freeze of production is all based in fear not fact.

I want to protect the environment, but I do not want to crush an American Art Industry on assumed causation.

Please do whatever you can to prevent the loss of small businesses, jobs and an entire art form. The American Art Glass community needs your help.